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May 19, 2020

VIA ECF

Hon. Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Steven Donziger*, No. 19 Cr. 561 (LAP); 11 Civ. 691 (LAK)

Dear Judge Preska:

I respectfully submit this letter on behalf of the United States to request that the Court exclude the period from today through September 9, 2020 from the computation of time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A). The Government makes this exclusion request given the emergency created by the ongoing pandemic as noted in S.D.N.Y. Standing Order 20-MC-196, and so that the parties may prepare for the September 9 trial and file motions relating to the trial. The Government submits the ends of justice served by this exclusion of time outweigh the interests of the parties and the public in a speedy trial. The defense consents to this exclusion of time.

By making this application for exclusion of time, the Government does not concede that the Speedy Trial Act applies to this criminal case.

Respectfully submitted,

_____/s/_____
Rita M. Glavin
Special Prosecutor